

Stephen H. Gross  
Hodgson Russ  
60 E. 42<sup>nd</sup> Street, 37<sup>th</sup> Fl.  
New York, NY 10165

and

G. James Landon  
Richard D. Villa  
Streusand & Landon, LLP  
816 Congress Ave., Ste. 1600  
Austin, TX 78701

Attorneys for Vignette Europe Ltd.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>LEHMAN BROTHERS HOLDINGS,</b>	§	
<b>INC. et al.</b>	§	<b>Case No. 08-13555 (JMP)</b>
<b>Debtors.</b>	§	
	§	<b>(Jointly Administered)</b>

**VIGNETTE EUROPE LIMITED'S LIMITED OBJECTION TO  
THE FOURTH OMNIBUS NOTICE OF ASSUMPTION AND  
ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

Vignette Europe Limited ("Vignette"), a wholly-owned subsidiary of Vignette Corporation, hereby files this Limited Objection to the Debtors' Fourth Omnibus Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases ("Limited Objection"), and in support of this Limited Objection, Vignette will show as follows:

**I. Relevant Background**

1. On September 15, 2008 ("Petition Date"), and on various dates thereafter, Lehman Brothers Holdings, Inc. and certain affiliates (collectively, "Debtors") filed

8. Because the Notice alleges that the cure amount for the Contract is \$0.00, Vignette objects to the assumption and assignment of the Contract to the extent that Debtors do not provide for prompt payment of the proper cure amount to Vignette under 11 U.S.C. § 365(b).

### **III. Reservation of Rights**

9. By submitting this Limited Objection and objecting only to the proposed cure amount, Vignette does not waive and hereby reserves any and all further objections to any proposed assumption and assignment of the Contract.

### **IV. Conclusion & Prayer**

WHEREFORE, for the foregoing reasons, Vignette respectfully requests that the Court sustain this Limited Objection, require prompt payment of the actual cure amount of \$282,380.60 in U.S. dollars for the assumption and assignment of the Contract, and grant such other and further relief as this Court deems just and proper.

◇◇◇◇◇

Dated: October 15, 2008

Respectfully submitted,

By: /s/ Stephen H. Gross  
Stephen H. Gross, Esq. (SG-9904)  
**Hodgson Russ LLP**  
60 East 42<sup>nd</sup> Street, 37<sup>th</sup> Floor  
New York, New York 10165-0150  
Telephone: (212) 661-3535  
Facsimile: (212) 972-1677  
sgross@hodgsonruss.com

-and-

G. James Landon, Esq.  
Richard D. Villa, Esq.  
**Streusand & Landon LLP**  
816 Congress Avenue, Suite 1600  
Austin, TX 78701  
Telephone: (512) 236-9901  
Facsimile: (512) 236-9904

**ATTORNEYS FOR VIGNETTE  
EUROPE LIMITED**

**EXHIBIT A**



**VIGNETTE**

Vignette Europe Limited  
Voyager Place, Shoppenhangers Road  
Maidenhead, Berks. SL6 2PJ  
Tel: +44 (0) 1628 772800  
Fax: +44 (0) 1628 772288  
Web: <http://www.vignette.com>

# INVOICE

Tax Reference: GB 799169748

## INVOICE ADDRESS:

ACCOUNTS PAYABLE  
CAPSTONE MORTGAGE SERVICES LIMITED  
ACCOUNTS PAYABLE  
PO BOX 50559  
LONDON E14 5WU

## REMIT TO:

Vignette Europe Ltd  
Voyager Place  
Shoppenhangers Road  
Maidenhead Berkshire SL6 2PJ

## DELIVERY ADDRESS:

SIMON HURLL  
CAPSTONE MORTGAGE SERVICES LIMITED  
IT SUPPORT  
GROUND FLOOR, 6 BROADGATE  
LONDON EC2M 2QS

Invoice	
NUMBER 22003201	
DATE + TAX POINT 19-AUG-08	PAGE 1 of 1
PURCHASE ORDER NUMBER	
OUR REFERENCE	
SALES ORDER NUMBER	
CUSTOMER NO. 56180	LOCATION NO. LONDON 1

TERMS		DUE DATE		SALES PERSON		CUSTOMER CONTACT				
NET 30.		18-SEP-08				ACCOUNTS PAYA				
ITEM NO.		Invoice			QUANTITY			VAT	UNIT PRICE	NET AMOUNT
		ORDERED	BACK ORDERED	DESPATCHED						
1		Back, Norman Senior Consultant - VP 18.00 Hrs @ 131.25			1		1		2,362.50	2,362.50
2		TRAVEL EXPENSES			1		1		69.40	69.40
		Tax Summary by Tax Name								
		-----								
		Tax UKSTD @ 17.50								425.59
					SUB TOTAL		VAT	SHIPPING/ HANDLING	TOTAL	
CAPSTONE AOH CAP701					2,431.90		425.59	0.00	2,857.49	
									Currency: GBP	

VAT REGISTRATION NO. GB 707 4912 33

Bank Details: Barclays, St Albans AL1 3AN  
Sort Code: 20-74-09 A/C: 5039 4483  
IBAN: GB06 BARC 20740950 3944 83  
SWIFT: BARCGB22

IF YOU HAVE ANY QUERIES CONCERNING THIS INVOICE  
PLEASE EMAIL OUR ACCOUNTS DEPARTMENT ON [AR.UK@VIGNETTE.COM](mailto:AR.UK@VIGNETTE.COM)



**VIGNETTE**

Vignette Europe Limited  
Voyager Place, Shoppenhangers Road  
Maidenhead, Berks. SL6 2PJ  
Tel: +44 (0) 1628 772000  
Fax: +44 (0) 1628 772288  
Web: <http://www.vignette.com>

# INVOICE

Tax Reference: GB 799169748

## INVOICE ADDRESS:

ACCOUNTS PAYABLE  
CAPSTONE MORTGAGE SERVICES LIMITED  
ACCOUNTS PAYABLE  
PO BOX 50559  
LONDON E14 5WU

## REMIT TO:

Vignette Europe Ltd  
Voyager Place  
Shoppenhangers Road  
Maidenhead Berkshire SL6 2PJ

## DELIVERY ADDRESS:

SIMON HURLL  
CAPSTONE MORTGAGE SERVICES LIMITED  
IT SUPPORT  
GROUND FLOOR, 6 BROADGATE  
LONDON EC2M 2QS

Invoice	
NUMBER 22003201	
DATE + TAX POINT 19-AUG-08	PAGE 1 of 1
PURCHASE ORDER NUMBER	
OUR REFERENCE	
SALES ORDER NUMBER	
CUSTOMER NO. 56180	LOCATION NO. LONDON {

TERMS		DUE DATE	SALES PERSON	CUSTOMER CONTACT					
NET 30.		18-SEP-08		ACCOUNTS PAYA					
ITEM NO.	Invoice			QUANTITY			VAT	UNIT PRICE	NET AMOUNT
				ORDERED	BACK ORDERED	DESPATCHED			
1	Back, Norman	Senior Consultant - VP		1		1		2,362.50	2,362.50
		18.00 Hrs @ 131.25							
2	TRAVEL EXPENSES			1		1		69.40	69.40
Tax Summary by Tax Name									
-----									
	Tax UKSTD @ 17.50								425.59
				SUB TOTAL		VAT	SHIPPING/HANDLING	TOTAL	
CAPSTONE AOW CAP701				2,431.90		425.59	0.00	2,857.49	
Currency: GBP									

VAT REGISTRATION NO. GB 707 4912 33

Bank Details: Barclays, St Albans AL1 3AN  
Sort Code: 20-74-09 A/C: 5039 4483  
IBAN: GB06 BARC 20740950 3944 83  
SWIFT: BARCGB22

IF YOU HAVE ANY QUERIES CONCERNING THIS INVOICE  
PLEASE EMAIL OUR ACCOUNTS DEPARTMENT ON [AR.UK@VIGNETTE.COM](mailto:AR.UK@VIGNETTE.COM)